

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN T. POWERS, JR.,

Plaintiff,

**STIPULATED ORDER OF
CONFIDENTIALITY**

-against-

COUNTY OF SUFFOLK, SUFFOLK COUNTY TRAFFIC
AND PARKING VIOLATIONS AGENCY, SUFFOLK
COUNTY POLICE DEPARTMENT, SUFFOLK
COUNTY POLICE OFFICER "JOHN" WEISS, said first
name being a fictitious name, the true name being
unknown to the Plaintiff, being and intended to be
an unknown Suffolk County Police Officer,
SUFFOLK COUNTY SHERIFF'S DEPARTMENT,
"JOHN DOE #1", said name being a fictitious name,
the true name being unknown to the Plaintiff, being
and intending to be an unknown Deputy Sheriff of
the Suffolk County Sheriff's Department, "JOHN
DOE #2", said name being a fictitious name, the
true name being unknown to the Plaintiff, being
and intended to be unknown Security Guard for the
Suffolk County Parking and Violations Agency and
LOU RE,

15-cv-5116(LDW)(ARL)

Defendants.

1. This stipulation applies to all parties and their attorneys with respect to the production of documents that contain confidential information.

2. It is, accordingly, hereby agreed and stipulated that:

(a) Counsel is defined to mean Harold A. Steuerwald, LLC, attorney for plaintiff and all employees and agents and any person in the employ of said counsel necessary to assist in this litigation, including consultants and experts.

(h) In the event that a party wishes to use a confidential document or any confidential information therein in any paper filed in this litigation, such paper (or part thereof containing the confidential document or confidential information) shall be filed under seal and maintained under seal by the Court.

(i) Persons to whom confidential documents are made available under this stipulation are bound by the restrictions contained herein.

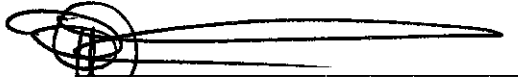
(j) Nothing herein shall be deemed to permit the provision of confidential documents, or the disclosure of the contents of confidential documents, to any member of the press, media, print, broadcast, cable, satellite or internet; or to any person or entity purporting to be working in the public interest. It is understood that any such provision or disclosure is a violation of this Order, the First Amendment rights of the recipients notwithstanding.

(k) In the event that a confidential document or any part thereof is read into the record at a deposition or quoted in a document generated in this litigation, the portion of said deposition or document containing the language from the confidential document shall also be confidential; and the underlying confidential document shall remain confidential notwithstanding that a portion of it was read into the record at a deposition or quoted in a document generated in this litigation.


(l) It is further understood that this Stipulation be "so ordered" without further notice and may then be enforced as a court order, even after the entry of final judgment in this action. If this Stipulation is "so ordered," a copy will be furnished to

counsel upon issuance of said order.

Dated: Hauppauge, New York, 11788
May 3, 2016



Harold A. Steuerwald, LLC.
Attorney for Plaintiff
112 South Country Road, Suite 116
Bellport, NY 11713



Dennis M. Brown
Suffolk County Attorney
Attorney for Defendants
100 Veterans Memorial Highway
Hauppauge, New York 11788
By: Arlene S. Zwilling
Assistant County Attorney

SO ORDERED:

Dated: Central Islip, New York

May _____, 2016

HON. ARLENE L. LINDSAY, U.S.M.J.